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To: CBSC@DGS
Subject: Adopt EVCAC's recommendations for Items 5, 12 & 14 of the CALGreen code, Title 24, Part 11
Date: Wednesday, May 3, 2023 6:42:45 PM

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Executive Director Mia Marvelli,

I am writing in strong support of the EV Charging for All Coalition (EVCAC)'s feedback on Items 5, 12, and 14 of the draft language for the CALGreen Intervening Code Cycle. These thoughtful recommendations will provide essential clarity, allow builders to choose lower-cost building options, and increase the number of newly built apartments and condos with access to EV Ready charging.

Most importantly, I ask that, in Item 5, a sentence be added to clarify that a developer may follow the voluntary Tier 1 or Tier 2 standards in lieu of the standards included in the mandatory section. This simple clarification will avoid confusion and increase flexibility for builders. It also has the potential, in some cases, to decrease the compliance cost of new multifamily housing while simultaneously expanding access to EV charging for multifamily residents.

In addition, please revise the wording of Item 12 to provide consistency with the other residential EV charging amendments that have eliminated the use of "EV Capable" spaces as a compliance option (requiring EV Ready or EVSE instead).

Finally, in Item 14, please remove the Exception language stating "or parking facilities otherwise incapable of supporting electric vehicle charging" to avoid undermining the intended purpose of the code.

These three well-considered recommendations are in the best interests of residents of new multi-family homes, staff of state and local enforcing agencies, and builders and developers as well. Please act upon the public's feedback during this Public Comment Period so that it's as robust a public process as possible. Thank you for listening.

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